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Federal Communications Commission
Office of Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matters of

Implementation of the Telecommunications
Act of 1996: Reform of Filing Requirements
and Carrier Classifications

Anchorage Telephone Utility
Petition for Withdrawal of Cost Allocation
Manual

CC Docket No. 96-193;

AAD 95-91

COMMENTS OF AMERITECH

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SUMMARY

Ameritech supports the comments that are being simultaneously filed by the United States Telephone Association ("USTA") in this proceeding. USTA and others (including Ameritech) have submitted Part 64 Joint Cost streamlining proposals in their comments in CC Docket 96-150. Those filings propose that the Part 64 administrative process be simplified with the elimination of the sixty-day approval period, quantifications of CAM changes, and the suspension provision.

Furthermore, the Commission should stagger the filing date of the annual ARMIS reports and eliminate those schedules on the ARMIS 43-02 that only support cost of service/revenue requirement regulation.

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COMMENTS OF AMERITECH

In this Order and Notice of Proposed Rulemaking, the Commission proposes to implement changes to its rules necessary to effectuate Section 402(b)(2)(B) of the Telecommunications Act of 1996, which directs that cost allocation manuals (CAMs) and ARMIS (Automated Reporting Management Information System) reports need only be filed annually, and Section 402(c), which directs that an inflation adjusted threshold be established for the classification of carriers and reporting requirements. Ameritech supports the comments that are being simultaneously filed by the United States Telephone Association ("USTA") in this proceeding and also provides the following comments.

The NPRM proposes either to retain the sixty-day CAM notification requirement or eliminate CAM filings other than once a year absent a waiver. This is necessary, it is said, because the purpose of the notification requirement remains valid, *i.e.* accounting for new and existing ventures (NPRM at 21). Ameritech disagrees because there is no statutory requirement for Commission notification of a CAM change and the purpose of the notification requirement for no-sharing price cap carriers is no longer applicable. In any event the Commission should shorten the notification requirement or adopt a process similar to the tariff process to streamline this requirement.

Instead of either of those two proposals, the Commission should forbear from regulation or adopt the Part 64 Joint Cost streamlining proposals of USTA. (See Comments of USTA in CC Docket 96-150 filed August 26, 1996; see *also* Comments of Ameritech in that docket.) Specifically, USTA has proposed that the Part 64 administrative process be simplified with the elimination of the sixty-day approval period, quantifications of CAM changes, and the suspension provision. In no event should the Commission adopt its alternative proposal to require a waiver for all CAM changes. Use of the waiver process for what are predominately routine CAM changes is not an efficient use of carrier or Commission resources. Moreover, such a procedure would be

more burdensome and costly than the existing rules, which would be inconsistent with the overall deregulatory thrust of the Act.

The NPRM proposes a uniform filing date for all ARMIS reports of April 1 (NPRM at ¶ 27). Ameritech agrees that the statute is clear that ARMIS reports need only be filed annually. There is nothing in the statute however, that requires that all ARMIS reports be due on the same filing date. Ameritech agrees with the USTA proposal that the filing of ARMIS reports should be staggered with the financial reports (ARMIS 43-01, 43-02, 43-03, 43-04, 495A and 495B) due April 1 and the operational and infrastructure reports (ARMIS 43-05, 43-06, 43-07, 43-08) due July 1. This allows for more efficient use of resources in the planning, preparation, and filing of the reports and is consistent with the requirements of the Act.

Ameritech supports the NPRM's proposed elimination of the reporting requirement contained in Section 43.21(b) which provided that supplemental information be submitted for carriers that maintained separate departments or divisions for carrier and noncarrier operations. Since neither AT&T nor the BOCs are organized in such a manner, the reporting requirement was deleted (NPRM at 38).

Ameritech recommends that the Commission also eliminate the continued reporting requirements of several of the ARMIS schedules

contained on the 43-02, USOA Annual Report. Several schedules pertain only to cost of service/revenue requirement regulations and should be eliminated for those carriers that operate under price caps with no sharing. Examples include Schedule I-3 (Pension Cost), Schedule I-4 (Operating Other Taxes), Schedule I-5 (Prepaid Taxes and Tax Accruals), Schedule I-6 (Special Charges), and Schedule I-7 (Donations or Payments for Services Rendered by Persons Other Than Employees).

For the foregoing reasons, Ameritech submits that the Commission should eliminate the sixty-day CAM notification requirement, stagger the filing date of the annual ARMIS reports, and eliminate those schedules on the ARMIS 43-02 that only support cost of service/revenue requirement regulations.

Respectfully submitted,



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